

CV-14-PT-0598-S

2014 Apr-01 PM 03:44  
U.S. DISTRICT COURT  
N.D. OF ALABAMA

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA**

James Broadhead,Inmate Identification Number: 224802,

(Enter above the full name of the plaintiff  
in this action)

vs.

<sup>1</sup> Officer, [REDACTED], nurse, LPN, Scott.<sup>2</sup> Officer, Yo, C, SIMPSON.<sup>3</sup> Officer, Yo, Jason Smith.<sup>4</sup> Officer, Yo, B. MERLE

(Enter above full name(s) of the defendant(s)  
in this action)

## I. Previous lawsuits

- A. Have you begun other lawsuits in state or federal court(s) dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes ( ☒ ) No ( ☐ )

- B. If the answer to (A) is "yes," describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuit(s) on another piece of paper, using the same outline.)

## 1. Parties to this previous lawsuit:

Plaintiff: \_\_\_\_\_

\_\_\_\_\_

Defendant(s): \_\_\_\_\_

\_\_\_\_\_

2014 APR 1 AM 11:27  
NOTICE TO FILING PARTY  
U.S. DISTRICT COURT  
N.D. OF ALABAMA

*It is your responsibility to  
notify the clerk in writing of any  
address change.*

*Failure to notify the clerk may  
result in dismissal of your case  
without further notice.*

# Statement

5. C/o. S. Harrison.
6. C/o. S. Cooks.
7. C/o. Wilson.
8. C/o. BHLLS.
9. C/o. T. Thomas.
10. Sgt. FOSTER.
11. C/o. A. Campbell.
12. C/o. J. Powell.
13. C/o. PHILLIPS.
14. C/o. C. OLDS.
15. C/o. S. COURTNEY.
16. C/o. Brewer.
17. C/o. Brennan.
18. C/o. T. Clarke.
19. C/o. A. Lewis.
20. C/o. M. Gasdon.
21. C/o. Montgomery.
22. C/o. E. Wright.
23. C/o. C. SUTTON.
24. C/o. V. MAIZE.
25. C/o. E. MARTINS.
26. C/o. L. COOK.
27. H. Chancey. <sup>MHP.</sup>
28. nurse, LPN. SCOTT.
29. nurse. MHP. SUTTON.
30. nurse. MHP. S. WILLIAMS.
31. nurse. LPN. MHP. M. Wilson
32. Evelyn Dorsett
33. Corinne Moore.
34. B. B. B. B.
35. C/o. Darryl W Brown.
- ~~36. C/o. [REDACTED]~~
- ~~37. C/o. [REDACTED]~~
- ~~38. C/o. [REDACTED]~~
36. C/o. M. Harrison.
37. C/o. Neaker
38. C/o. J. Neaker.
39. C/o.
40. Sgt. S
41. C/o. D
42. C/o. ~~[REDACTED]~~
43. nurse LPN. M. Hall.

3,

2. Court (if Federal Court, name the district; if State Court, name the county)

\_\_\_\_\_

3. Docket number \_\_\_\_\_

4. Name of judge to whom case was assigned \_\_\_\_\_

\_\_\_\_\_

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) \_\_\_\_\_

\_\_\_\_\_

6. Approximate date of filing lawsuit \_\_\_\_\_

\_\_\_\_\_ N/A

7. Approximate date of disposition \_\_\_\_\_

II. Place of present confinement William E. Donaldson Correctional Facility,

- A. Is there a prisoner grievance procedure in this institution?

Yes ( ☒ ) No ( ☐ )

- B. Did you present the facts relating to your complaint in the state prisoner grievance procedure? Yes ( ☐ ) No ( ☒ )

- C. If your answer is YES:

1. What steps did you take? \_\_\_\_\_

\_\_\_\_\_

2. What was the result? \_\_\_\_\_

\_\_\_\_\_

- D. If your answer is NO, explain why not: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## IV, EXHAUSTION OF LEGAL REMEDIES.

- 16, There is no Inmate Grievance procedure in the Alabama, Department of Corrections AR #319, Inmate Grievance procedure is not available to inmates because it is still on review.
- 17, Plaintiff, re-allege and incorporate by reference to paragraphs 1-16,
- 18, The unlawful Deadly Physical Force on-plaintiff constitute ASSAULT and Battery. Violated plaintiff, James Broadhead, rights and Constitution of A. Criminal Offense in Alabama under the Statutes Code 18963. 44, sections § 13A-3-23, Section § 13A-12(8) section § 13A-1-2.(9), of the criminal Code of 1975,
- 19, The broken EL-bow and burst head and teeth broken of plaintiff, Violated plaintiff James Broadhead rights under the Statutes, Sections § 13A-3-23, 13A-1-2(8) 13A-1-2 (9) of the criminal Code of 1975, and constituted Deleprocess Violation under Color of State law under the Section § 8, 10, 11, 13, 15, of Art I of the Constitution of Alabama of 1901, 20) The plaintiff has no plain adequate or complete remedy at law to redress the wrongs described herein Plaintiff has been and will continue to be irreparably injured by the court of the defendants unless the court grants the prosecutions and the compensatory and punitive damages relief which plaintiff seeks,

## VI, Prayer For relief.

Wherefore plaintiff respectfully prays that this court enter judgment granting plaintiffs: 21). A declaration that the acts and omissions described herein Violated plaintiff's rights under the Statutes under the criminal offense under the title 13A criminal Code, of 1975, and the constitution and laws of the State of Alabama 22). compensatory damages in the amount of \$10,000,00 against each defendant jointly and severally 23). Punitive damages in the amount of \$10,000,00 against each defendant, 24). A. jury trial on all issues triable by jury 25). Granting Appointment of Counsel 26). Plaintiff cost in this case 27). Circuit court judges authority granted them by law to exercise such other powers as are or may be granted them by law [312-17-26, code of Alabama 1975],

4.

## III. Parties.

In item (A) below, place your name in the first blank and place your present address in the second blank.

A. Name of Plaintiff(s) James M. Broadhead #224802, Segregation 5-12,  
William E. Donaldson Correctional  
 Address Fadley 100, Warrbor Lane  
Bessemer, AL 35023,

In item (B) below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use Item (C) for the names, positions, and places of employment of any additional defendants.

B. Defendant \_\_\_\_\_  
 Is employed as \_\_\_\_\_  
 at \_\_\_\_\_

C. Additional Defendants \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

## IV. Statement of Claim

State here, as briefly as possible, the FACTS of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheets, if necessary.

I, James M. Broadhead would like to make a state ment on  
behalf of the Assault that took place on me I was for ~~me~~ WS to  
the ground ~~to~~ from a blow to my testicle while on the  
around I was kick-ed again and again to the testicle This type  
of Assault per for form ued on me was out of habe Be douse  
of my conviction how; Know this to be true In the process



~~of being Assault to the testicle I could hear a~~  
 OF being Assault to the testicle I could hear a  
 voice say and; quote you'll never be able to rape  
 another old ladyung quote you'll never be able to rape  
 another This is how; know said Assault

## V. RELIEF

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

was per for m-ed out of pure hate,

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 3/30/2014.

JAMES Broadhead 5-12  
 SIGNATURE

ADDRESS William E. Donaldson  
Correctional Facility 100. Warrrior,  
Bessemer AL 35023,

AIS # 224602

6,

The Prison do NOT have a grievance procedure BUT I "STILL" made complaint TO Warden and Commissioner I" was PUT on Transfer Donaldson Correctional SO I EXHAUST all available administrative remedies, before The filing of This The act of The (prison) Officer, ~~and~~ <sup>and</sup> Officer, ~~Co.~~ <sup>all</sup> (4) is employed as Defendants acted under STATE Law and color of STATE Law with Deadly Excessive force as The Plaintiff was BEAT and STRUCK WITH SECURITY STICKS by (4) Officers Named herein as Defendants IN said case Therefore The Plaintiff was STRUCK,

"COOPER GREEN Hospital"  
 989 Times by The Plaintiff was placed IN 2 free world Hospital, where He Had a broken arm IN (3) places and STAPLES IN The head and (3) or (4) Teeth was Knocked out as There was Threats on The Plaintiff Life The Plaintiff was Transferred for His safety as The Plaintiff Had fracture To His feet and

ankle area from Deadly Excessive  
 force from Defendants, "Compensatory  
 Damages IN The amount of \$12,000,00 against  
 NS Each Defendant JOINTLY and severally  
 for Irreparable IN Juries..... Punitive  
 Damages, IN The amount of \$12,000,00 against  
 NS Each Defendant, JOINTLY and severally  
 for Irreparable IN Juries..... for  
 a total sum of \$ 80,000,00 Thousand Dollars  
 TOTAL CLAIM PLAINT AT COSTEN  
 LAWSUIT,

x James Bradley

# 224802,  
 HES

Segregation S-12.

3-30-14

9:58 P.M.